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Attorneys for Plaintiff Epic Games, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games, Inc. v. Google LLC et al.,
Case No. 3:20-cv-05671-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF YONATAN EVEN IN
SUPPORT OF EPIC GAMES, INC.'S
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIALS SHOULD BE
SEALED**

Judge: Hon. James Donato

1 I, Yonatan Even, declare as follows:

2 1. I am a partner at Cravath, Swaine & Moore LLP, counsel to Epic Games, Inc.
3 (“Epic”) in the above-captioned actions. I am admitted to appear before this Court *pro hac vice*.

4 2. I submit this declaration pursuant to Civil Local Rule 79-5. The contents of this
5 declaration are based on my personal knowledge.

6 3. Epic’s Response to Google’s Proffer Regarding Epic’s Proposed Injunction
7 (“Epic’s Response”), its accompanying exhibits (“Exhibits”), Dr. Michael D. Ernst’s Declaration
8 in Support of Epic’s Response (“Ernst Declaration”), and Dr. James Mickens’ Declaration in
9 Support of Epic’s Response (“Mickens Declaration”) contain portions that are sourced from
10 materials that Defendants Google LLC, Google Ireland Limited, Google Commerce Limited,
11 Google Asia Pacific Pte. Limited, and Google Payment Corp. (collectively, “Google”) have
12 designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
13 ONLY”, pursuant to the operative Protective Orders entered by the Court, Case No. 3:21-md-
14 02981-JD, ECF Nos. 123, 154 and 170. The following table shows the portions of Epic’s
15 Response, the Exhibits, the Ernst Declaration and the Mickens Declaration that contain
16 information designated as “CONFIDENTIAL”, or “HIGHLY CONFIDENTIAL –
17 ATTORNEYS’ EYES ONLY”.

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Excerpts of Deposition Transcript of David Kleidermacher (Exhibit 1)	Redacted in Full	Google

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Excerpts of Deposition Transcript of Vitor Baccetti (Exhibit 2)	Redacted in Full	Google
Excerpts of Deposition Transcript of Edward Cunningham (Exhibit 3)	Redacted in Full	Google
Excerpts of Deposition Transcript of Christian Cramer (Exhibit 4)	Redacted in Full	Google
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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct and that I executed this declaration on July 24, 2024 in New York, New York.

3
4 By: /s/ Yonatan Even
Yonatan Even

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6 *Attorney for Plaintiff Epic Games, Inc.*
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